

EXHIBIT 7

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Date: Sunday, January 28, 2024 11:57:02 AM
Attachments: [image001.png](#)
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Sara

We can be available for your suggested 4 pm EST 'Meet & Confer'. In an effort to get to a conclusion on this issue, we have gotten a suggestion from our group as set out below. We believe that this is a good way to proceed.

PLAINTIFFS' PROPOSAL

1. The two project files are turned over complete with no removals.
2. Both plaintiffs and defendants assign their respective discovery teams to start a review of the docs to identify those docs that:
 - a. Are duplicates of docs/collections we have already received. These docs/collections can be deleted from the corresponding project file.
 - b. Should be clawed back for any reason (protected, non-responsive...) These docs would be "returned" (deleted) from the plaintiff project files discovery.
 - c. "New" non-native files that are not linked or associated with any software such as pdf files not already produced. These docs would be reviewed for relevance and those that are should be bates stamped. Those that aren't should be returned/deleted.
 - d. Any native files that are/maybe associated with a software program either as internal to the software program, an input to the software program or an output of the software program. These files need to remain unchanged – no file name change, and no location change to maintain any possible link they have with the software. We can explore the following:

Assigning a bates number to the entire project file, one for modeling and one for health studies. Files from these can be marked with the base bates number and then a ".000001" prefix.

The possibility of assigned bates numbers to specific groups of files such as water modeling, health study models, GIS project. The subfolders would be assigned the bates not the files so any links should be retained and those that are broken should be easy to relink.

3. If any of our experts rely on any of the water modeling files, health study models, GIS or other parts of the ATSDR projects relating to work the ATSDR performed during the

Camp Lejeune Investigation we could do the following:

- a. The software and the input files could be produced on a thumb drive which can be bates stamped in preparation for their depo.
- b. The output files could be produced separately with the appropriate bates stamps if their format allows it. If it does not, they can be produced on a separate thumb drive that can be bates stamped and eventually marked as a deposition exhibit.

Thanks

Ed Bell



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